

Message

From: danielle.larochelle@us.nufarm.com [danielle.larochelle@us.nufarm.com]
Sent: 4/7/2016 4:28:50 PM
To: Sow, Fatima [Sow.Fatima@epa.gov]
Subject: Re: Label Revisions Requested: 55146-97, 55146-99
Attachments: 055146-00097.20160407.Label_Amend.pdf; 055146-00097.20160407.Label_Amend_Tracking on.pdf; 055146-00099.20160407.Label_Ca OTC Nominal.pdf; 055146-00099.20160407.Label_Ca OTC Nominal_Tracking on.pdf

Flag: Follow up

Hi Fatima,

Attached are the revised labels for 55146-97 and 55146-99 (one copy with changed tracked and a clean copy).

For 55146-97

I have added "Agricultural Bactericide" below the product name.

For consistency, in the first sentence immediately below the Agricultural Use Requirements box on page 5, I have also changed the sentence "This product contains the *antibiotic* oxytetracycline." to "This product contains the *bactericide* oxytetracycline."

For 55146-99

I have made the changes you requested and also replaced the word "antibiotic" with bactericide in the statements below the product name to be consistent.

I have removed the statement "SEE BELOW FOR FIRST AID AND PRECAUTIONARY STATEMENTS" in the KOOROC box. The entire label is printed on one page and attached to the container - the statement is therefore not needed.

Regarding our conversation this morning about the PPE required by RED for all oxytetracycline products, I noticed that the product FireLine 17 WP (Reg. No. 80990-1) does not list a respirator. This product is a wettable powder that is not packaged in a water soluble bag. Also, another product registered one week ago, Reg. No. 80990-6 (FireLine 45 WP), does not list a respirator in the PPE section. This product is a wettable powder and based on the Container Handling statement included on the label, it is not packaged in a water soluble bag either.

Mycoshield is also a wettable powder formulation similar to FireLine. Does the respirator requirement from the RED apply to Mycoshield or is there a substantial difference between Mycoshield and the FireLine products that triggers the requirement?

Let me know if you have any questions.

Best Regards,

Danielle

Danielle A. Larochelle | Regulatory Manager

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From: "Sow, Fatima" <Sow.Fatima@epa.gov>
To: "danielle.larochelle@us.nufarm.com" <danielle.larochelle@us.nufarm.com>,
Date: 04/06/2016 04:41 PM
Subject: Label Revisions Requested: 55146-97, 55146-99

Ms. Larochelle,

I'm in the process of reviewing the CSF and label amendments for EPA Reg. Numbers 55146-97 and 55146-99. Attached are copies of the product labels with some minor proposed changes. Please revise these labels and email me the new versions with the changes incorporated.

If you have any questions regarding this request, please don't hesitate to contact me.

Best regards,
Fatima Sow
U.S. Environmental Protection Agency
OCSPP/Office of Pesticide Programs
Registration Division
(703) 347-8308
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[attachment "55146-99_label comment hj.pdf" deleted by Danielle Larochelle/US/Nufarm] [attachment "55146-97_Label comment hj.pdf" deleted by Danielle Larochelle/US/Nufarm]

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